

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA

V.

MICHAEL DILLARD

CRIMINAL NO. 4:24CR

18 U.S.C. § 2241

Aggravated Sexual Abuse

(Counts 1 and 2)

18 U.S.C. § 2242

Sexual Abuse

(Counts 3 and 4)

18 U.S.C. § 2244

Abusive Sexual Contact

(Counts 5 and 6)

18 U.S.C. § 1001

False Statement

(Count 7)

INDICTMENT

July 2024 Term - At Norfolk, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about or between July 27, 2022, and July 28, 2022, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia and elsewhere, the defendant, MICHAEL DILLARD, did unlawfully, knowingly and intentionally attempt to cause and cause K.N. to engage in a sexual act, to wit: contact between the penis and the vulva, by use of force against K.N.

(In violation of Title 18, United States Code, Section 2241(a).)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 27, 2022, and July 28, 2022, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia and elsewhere, the defendant, MICHAEL DILLARD, did unlawfully, knowingly and intentionally attempt to cause and cause K.N. to engage in a sexual act, to wit: penetration of K.N.'s genital opening by the finger, by use of force against K.N with the intent to gratify the sexual desire of MICHAEL DILLARD.

(In violation of Title 18, United States Code, Section 2241(a).)

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 27, 2022 and July 28, 2022, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia and elsewhere, the defendant, MICHAEL DILLARD, did knowingly cause and attempt to cause K.N. to engage in a sexual act, to wit, penetration of K.N.'s genital opening by the finger, with the intent to gratify the sexual desire of MICHAEL DILLARD, with K.N. who was, as the defendant well knew, at that time physically incapable of declining participation in the aforementioned sexual act.

(In violation of Title 18, United States Code, Section 2242(2).)

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 27, 2022 and July 28, 2022, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia and elsewhere, the defendant, MICHAEL DILLARD, did knowingly cause and attempt to cause K.N. to engage in a sexual act, to wit, contact between the penis and the vulva, with K.N. who was, as the defendant well knew, at that time physically incapable of declining participation in the aforementioned sexual act.

(In violation of Title 18, United States Code, Section 2242(2).)

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about or between July 27, 2022, and July 28, 2022, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia and elsewhere, the defendant, MICHAEL DILLARD, did unlawfully, knowingly and intentionally engage in sexual contact, to wit: mouth on unclothed breast, with a person, to wit: T.C. without the permission of T.C. with the intent to gratify the sexual desire of MICHAEL DILLARD.

(In violation of Title 18, United States Code, Section 2244(b).)

COUNT SIX

THE GRAND JURY CHARGES THAT:

On or about or between July 26, 2022, and July 27, 2022, in the special maritime and territorial jurisdiction of the United States, within the Eastern District of Virginia and elsewhere, the defendant, MICHAEL DILLARD, did unlawfully, knowingly and intentionally engage in sexual contact, to wit: hand on clothed breast, with a person, to wit: C.B. without the permission of C.B. with the intent to gratify the sexual desire of MICHAEL DILLARD.

(In violation of Title 18, United States Code, Section 2244(b).)

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about May 30, 2023, the defendant, MICHAEL DILLARD, in the Eastern District of Virginia, did willfully and knowingly make a false statement, knowing the same to contain a materially false, fictitious, and fraudulent statement in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating that he had no sexual contact with K.N., well knowing and believing that he in fact had sexual contact with K.N. on or about or between July 27, 2022 and July 28, 2022.

(In violation of Title 18, United States Code, Section 1001(a)(2).)

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the original of this page has been filed
under seal in the Clerk's Office

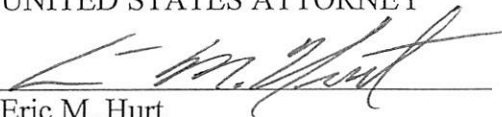
A TRUE BILL:

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FOREPERSON

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